

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 18-10102-DJC
)	
ASHLEY BARRETT,)	
)	
Defendant.)	

JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(b)

The United States and counsel for the Defendant file this joint memorandum pursuant to Local Rule 116.5(b), stating the following:

1. The government has provided automatic discovery. There are no pending discovery requests.
2. Defendant does not currently anticipate requesting additional discovery.
3. It does not appear at this time that there is a need for a protective order regarding the dissemination of sensitive information.
4. Defendant has not yet decided whether she will file any pretrial motions under Rule 12(b).
5. The Court has ordered that the government's expert disclosures, if any, be due 30 days before trial, and Defendant's expert disclosures, if any, be due 21 days before trial. *See* Initial Status Report (Doc. No. 23).
6. Defendant does not anticipate raising a defense of insanity, public authority, or alibi.
7. The Court has previously excluded the period from April 26, 2018 (the date of Defendant's arraignment) through August 6, 2018 (the date of the scheduled interim status

conference), for the purposes of the Speedy Trial Act. The parties agree that the period between August 6, 2018, and the date of the final status conference requested in paragraph 9 be excluded pursuant to 18 U.S.C. § 3161(h)(7)(a). The parties submit that the ends of justice served by permitting defense counsel to review and evaluate the discovery outweighs the best interest of the public and the Defendant in a speedy trial.

8. The parties have not yet had an opportunity to discuss a possible plea. They estimate that a trial will take approximately one week.

9. The parties request that the final status conference be scheduled during the week of September 10, 2018.

Respectfully submitted,

ASHLEY BARRETT
By her attorney,

/s/ Charles P. McGinty
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Certificate of Service

I certify that, on August 5, 2018, this document filed through the ECF system was sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christine J. Wichers
Christine J. Wichers